UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: NOV 3 1986

SUBJECT: Immediate Removal Request for the I. J. Recycling Facility Site, Ft. Wayne, Indiana - ACTION MEMORANDUM

FROM: Kenneth Theisen, On-Scene Coordinator
Western Response Unit

TO: Valdas V. Adamkus
Regional Administrator

THRU: Basil G. Constantelos, Director
Waste Management Division

PURPOSE

The purpose of this memorandum is to obtain your approval to expend $393,900 to characterize and stabilize the contents of approximately 2,700 drums, 21 storage tanks, and six tankers located in and adjacent to three buildings on the 4.5 acre subject site. In addition, the contents of the drums located in one of the large buildings will be bulked and disposed of thus providing a working area in which to operate.

It is anticipated that an additional Action Memorandum concerning this site will be forthcoming. This action (Phase II) will address the bulking, transportation, and disposal of all of the hazardous materials stored on-site. At the present time, this anticipated action is estimated to require an additional $746,100.

BACKGROUND AND SITE HISTORY

I. J. Recycling is located at 3651 Clinton Street, Allen County, Fort Wayne, Indiana. The facility includes three main buildings, a fire house, two pump houses, and a tank farm (see attachment I). The site is bordered by small businesses and nearby residential areas. Immediately adjacent to the north is the Glenbrook Mall, reportedly the largest shopping mall in the State (see attachment II). Various schools and apartment complexes are also in the immediate area. The Fort Wayne fire chief stated that a recent survey reported that on a typical weekend an estimated 55,000 people would be found at any given time in and around this shopping center.

The facility, formerly known as Continental Waste Systems, began operations in 1981 as a waste recovery and reclamation facility, handling waste oils and solvents along with various hazardous wastes. Its treatment methods included oil/water separation, acid/base neutralization, distillation, and others. It closed in 1985, due to pressure from the City, according to its former owner.

A potential buyer (Chemisphere) was found in August of 1984. The United States Environmental Protection Agency (U.S. EPA) was asked by the Small Business Administration, who had a financial interest in the property, to conduct a site assessment following an inventory of the facility by Pollution Control Systems in January 1985; this was to determine if there was any risk to the health or environment before approval of the sale. The U.S. EPA and its Technical Assistance Team conducted the inspection on February 25, 1985, and made various recommendations including: activating the sprinkler system, security, and daily inspections looking for leaking drums and unsafe conditions.

The U.S. EPA again became involved at this facility on January 3, 1986, when it investigated an organic solvent spill, which occured on December 24, 1985. The facility owner, now I. J. Recycling had a ceiling collapse and shear off a valve on a 10,000-gallon tank containing ink solvents. Five to 6 thousand gallons of material were spilled and approximately 1,500 gallons entered the storm sewer system. I. J. Recycling contracted Pollution Control System to cleanup the spill. Delays and financial problems between I. J. Recycling and Pollution Control Systems eventually allowed some of the material to enter the St. Joseph River.

The State of Indiana issued an Agreed Entry of a Preliminary Injunction to I. J. Recycling on March 22, 1986. This order prevented them from accepting any additional hazardous material until they lowered their existing inventory. The State did allow I. J. Recycling to continue to accept non-hazardous waste oils for processing in order to generate a cash flow.

On September 9, 1986, a chemical fire broke out in a room of building A. The local fire department and Hazardous Materials Response Team responded and extinquished the blaze before it narrowly missed igniting 525 drums of hazardous materials in an adjoining room. The City then asked for and was granted a temporary restraining order against I. J. Recycling, shutting down the facility. The mayor of Fort Wayne, citing the lack of progress in the facility reducing its inventory of hazardous material, the declining condition of the facility, and the recent history of worsening incidents requested another inspection by the U.S. EPA.

SITE INSPECTION

On September 23, 1986, the U.S. EPA conducted a site inspection accompained by the fire chief, mayor and a member of the city's Hazardous Materials Response Team. It was evident that the facility was not kept in good operating condition. Leaking roofs caused standing water in several locations. The basement of building A contained much standing water, presumably from the fire fighting effort. Many broken windows were in evidence, adding to the water

problem. The fire chief pointed out numerous violations of city electrical codes. Damaged PVC piping was noted in several locations. Although the majority of the 2,700 drums on the site were in good condition, a considerable number of "leakers" were observed. They were being contained by the usage of "Oil-Dri," an absorbent. General housekeeping throughout the facility was poor. Drums were found in almost every room and hallway of the facility. Debris from the spill in December of 1985 was piled in one of the buildings. Air monitoring detected elevated levels of organic vapors adjacent to the debris. The six tankers on-site partially full of sludges and waste pose an additional problem; one had developed numerous leaks and had been emptied by the fire department into drums. Although they are parked in a diked area, their contents and the inadequate capacity of the diked area constitute a potential spill problem. Many of the drums have conflicting labels, numbers, and symbols. As reported by the State, many drums were passed from owner to owner, each with a different marking system. Serious doubts exist as to their correct segregation.

Although the facility has presumably made some progress in treating and disposing of some of the drums and bulk storage, the overall number of drums on the site is about the same as when I. J. Recycling bought the facility. It is apparent to this OSC that the facility has lost its ability to manage, treat, and dispose of the hazardous materials in the vast number of drums and bulk storage containers found on the site.

THREAT

The I. J. Recycling facility was found to pose the following actual or potential threats to human health and the environment as delineated within Section 300.6(b)(2) of the National Contingency Plan.

a. Potential exposure of hazardous substances by populations, animals or food chain:

The recent site investigation has revealed that the contents and conditions of the numerous drums and storage tanks pose a significant threat to the nearby population. The potential for incompatible material combining and resulting in a chemical fire or violent chemical reaction exists. The resulting fire or reactions could emit potentially hazardous material into the air. The facility's close proximity to nearby residences, commercial and industrial facilities substantiate this threat.

b. Potential contamination of drinking water or other sensitive ecosystems:

The January 1986, release of solvents which reached the St. Joseph River via a storm sewer, documents the threat posed by the contaminants on this site. Additional releases originating or flowing through this site could potentially adversely impact the quality of the river water thereby affecting the City of Fort Wayne's water supply. Past and present housekeeping practices together with recent spills could potentially threaten the underlying aquifer.

c. Hazardous substances in drums and tanks that may pose a threat of release:

The contents of each drum and tank indicate various acids, bases and organics. Also, the nature of the facility and the discernable markings and shipping labels suggest that the contents are of a hazardous nature (see attachment V).

d. Weather conditions that may cause hazardous substances to be released:

Since the facility is located where winter brings freezing temperatures, and since the majority of the stored material is liquid thereby having a high water content, freezing temperatures could threaten the structural integrity of the various containers.

e. Threat of fire or explosion:

The most imminent threat posed by this site is the possibility of fire or explosion. Due to the flammable nature of organics such a threat is heightened by the amount of organic and other flammable or incompatable material on-site. The recent chemical fire which broke out in building A and other such incidents throughout the years document such a threat. In a fire the toluene diisocyanate (TDI) found on the site could produce a toxic gas. TDI is also reactive with water, forming an organic base and carbon dioxide gas.

ENFORCEMENT

Notification will be given and a CERCLA Section 106 Administrative Order will be issued to present owners and/or operators for the Phase I stabilization activities outlined in this memorandum. Once the site has been stabilized a further 106 Order will be issued.

PROPOSED COST AND PROJECT SCOPE

Phase I of this removal entails general site stabilization and the removal and subsequent disposal of the contaminated waste oils presently secured in 1,000 drums in building C. This would then allow the operation to have a building in fairly good shape in which to stage the contents of building A. It is anticipated that between building B and C all hazardous materials could be segregated and kept in a heated environment during the winter months awaiting disposal.

The operation would consist of screening the drums and tanks utilizing an OVA, monitox units and pH paper in order to classify their chemical nature. The drums would then be staged accordingly, overpacking any leaking drums, securing the staging areas and checking the storage tanks on-site to determine the potential for structural failure and repairing them as needed. Such a removal would reduce or eliminate the actual and potential threats posed by the hazardous materials and the condition of the site (see attachment III).

The estimated cost to cleanup this site consists of the following components:

PHASE I - Stabilization

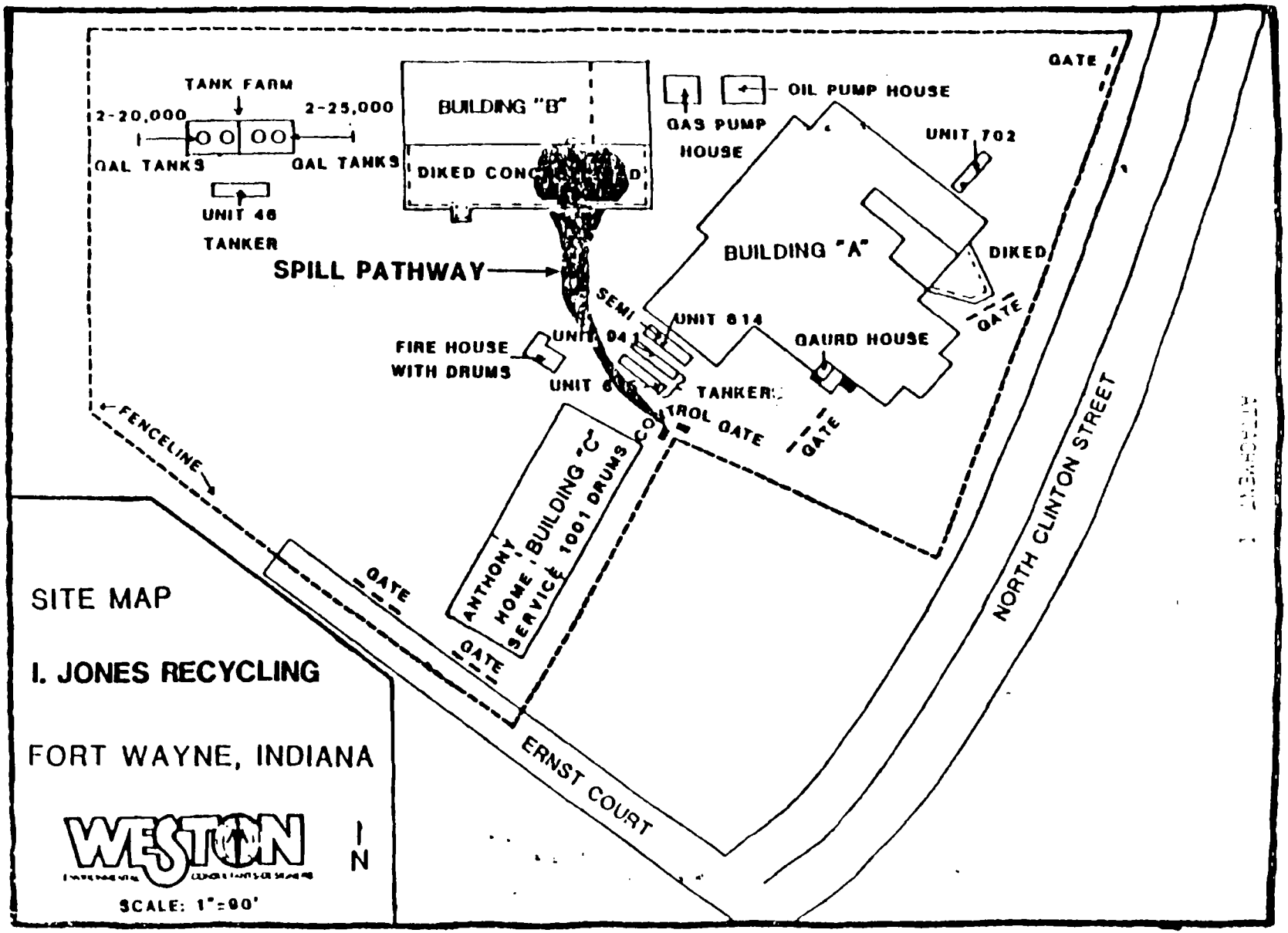
Personnel	$ 80,200
Equipment	66,800
Materials	10,400
Disposal of Oil; Water mixture (120,000 gal.) (assume 60,000 gal. hazardous)	144,000
Transportation	14,400
Sampling	1,800
Subtotal	317,600
Contract Contingency (15%)	47,600
Total Extramural Costs	$365,200
U.S. EPA Costs	6,000
TAT Costs	16,000
Other Costs	3,000
Subtotal	$ 25,000
Contingency (15%)	3,700
Total Intramural Costs	$ 28,700
TOTAL COSTS	$393,900

REGIONAL RECOMMENDATIONS

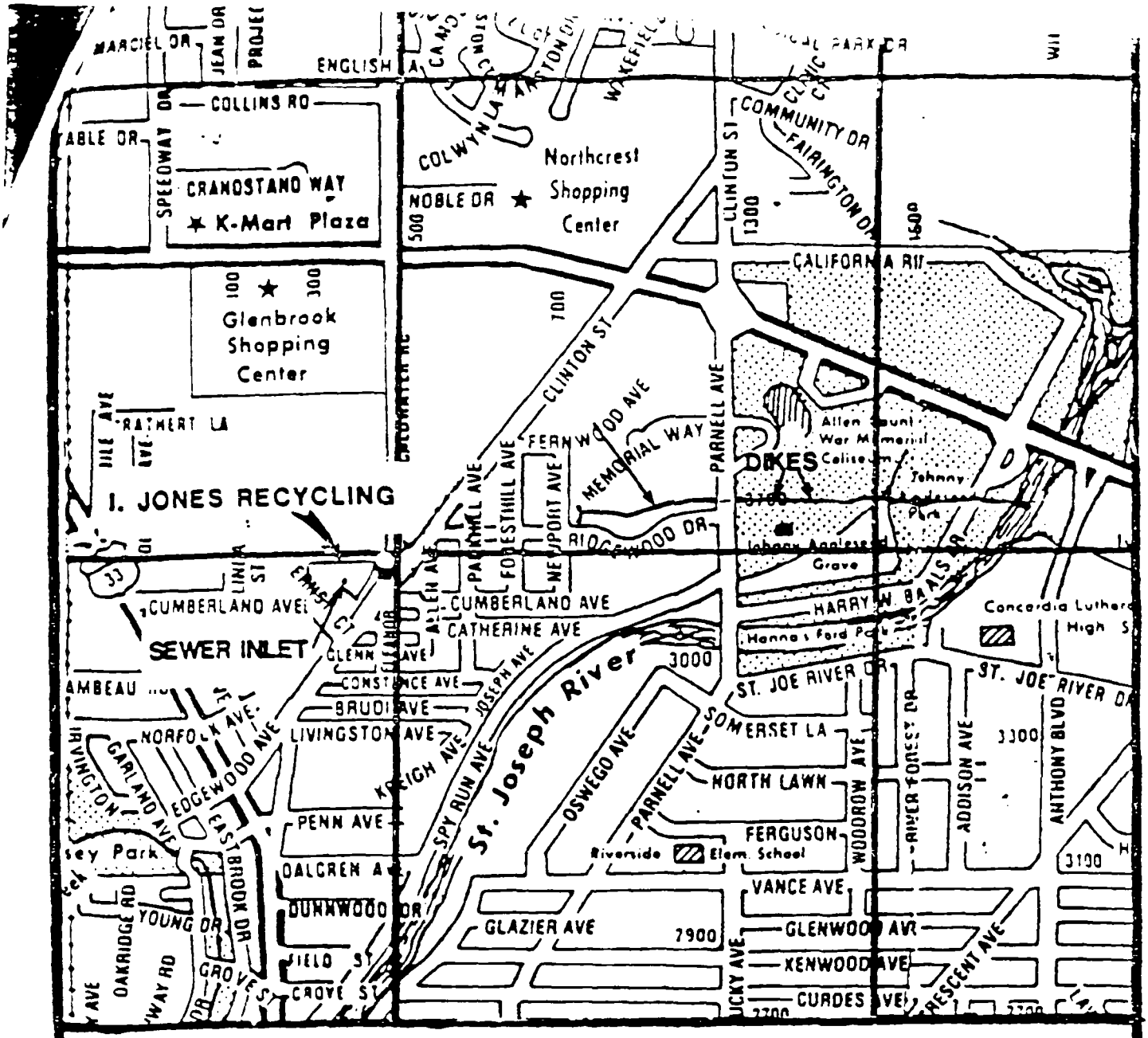
The State of Indiana has been contacted regarding this action. The State is requesting U.S. EPA action due to lack of State resources to perform this action. Because the threat present at the I. J. Recycling facility in Fort Wayne, Indiana, meets the National Contingency Plan, Section 300.65 criteria for an immediate removal, I recommend your approval of the proposed immediate removal request. The proposed actions are expected to successfully abate the threat to the public health and the environment. The total project will involve an expenditure of $393,900 of which $365,200 will be for extramural or contractor activities. You may indicate your approval or disapproval by signing below.

APROVE: Robert Springer for DATE: October 14, 1986
REGIONAL ADMINISTRATOR

DISAPPROVE: _____ DATE: _____
REGIONAL ADMINISTRATOR



SOURCE: LOUGHEED & ASSOCIATES, INC.



ATTACHMENT II

SPILL PATHWAY
I. JONES RECYCLING
FORT WAYNE, INDIANA

N

SCALE: 1"=1200'

DRAWN	DATE 1/8/86	DES. ENG.	DATE	
CHECKED		APPROVED		

Attachment III
Detailed Cost Estimate

Personnel

Item	Days		Amount
1 Response Manager @ $58.40/hr, $71.30/hr OT	20		$12,196.00
1 Foreman, Level 3, @ $37.40/hr, $49.10/hr OT	20		7,948.00
1 Chemist, Level 2, @ $40.90, $52.60/hr OT	20		8,648.00
3 Equipment operators, Level 2, @ $31.00/hr, $42.10/hr OT	20		19,931.00
3 Cleanup technicians, Level 2, @ $25.70/hr, $35.10/hr OT	20		16,548.00
2 Truck drivers @ $21.00/hr, $30.40/hr OT	1		457.60
1 Field clerk @ $17.50/hr, $24.00/hr OT	20		3,760.00
2 Per diems @ $66.15/da/ea	1		132.30
8 Per diems @ $66.15/da/ea	20		10,584.00
		Subtotal	$80,205.90

Equipment

Item	Days	Amount
1 Front-end 10 after (1.5 yd) @ $354/day	20	$ 7,080.00
2 Bobcats @ $301/da/ea	20	12,040.00
1 Passenger sedan @ $55.00/day	20	1,100.00
1 Pickup truck @ $62.00/day	20	1,240.00
2 OTR trailer @ $301.00/da/ea	1	602.00
2 Drum grapplers @ $157.00/da/ea	20	6,280.00
2 Flat beds @ $109.00/da/ea	20	218.00
1 Barret cart @ $44.00/da	1	880.00
1 Fork lift @ $157.00/da	20	3,140.00
1 Set of nonsparking tools @ $55.00/da	20	$ 1,100.00
2 Emergency lighting @ $27.00/da	20	2,540.00
1 Electrical submersible pump (3-in) @ $91.00/da	10	910.00
1 Office trailer @ $75.00/da	20	1,500.00
1 Decontamination trailer @ $326.00/da	20	6,520.00
1 Cascade system @ $56.00/da	20	1,120.00
1 Photoionization detector @ $67.00	20	1,340.00
1 Draeger pump (personnel air sampling pump) @ $8.00	20	160.00

Equipment (Continued)

Item	Days	Amount
1 HCN monitox unit @ $66.00/da	20	1,320.00
1 1200 psi High power washer @ $176.00/da	5	880.00
2 Level B protection @ $171.00/da/ea	20	6,840.00
5 Level C protection @ $62.00/da/ea	20	7,440.00
Mobilization/demobilization		2,022.40
2 Mileage for OTR trailers @ $.21/mi 300 mi round trip		126.00
Mileage for passenger sedan @ $.16/mi 300 mi round trip 4 trips		192.00
Mileage for pickup truck @ $.16/mi 300 mi round trip 4 trips		192.00
	Subtotal	$66,782.40

Disposal Analysis

Item	Amount
9 Composite samples for oil-water mixture for disposal parameters @ $200.00/sample	1,800.00

Transporation

Item	Amount
18 Loads of bulked oil-water mixture @ $4.00/loaded mi x 200 mi	14,400.00

Disposal

Item	Amount
120,000 gal of oil-water mixture @ $.80/gal (assumn 60,000 gal hazardous)	144,000.00

Materials

Item	Amount
100 85-gal overpack drums @ $97.56/ea	9,756.00
5 Rolls of Visqueen liner @ $100.00/roll	500.00
Miscellaneous material -pH paper -Draeger tubes -Warning signs/tape -Paper towels	150.00
Subtotal	10,406.00
Total	$317,600.00

Attachment IV

Chronology of U.S. EPA Emergency Response Section involvement in the I. J. Recycling facility in Fort Wayne, Indiana:

February 25, 1985	A site inspection done at the request of the Small Business Administration
January 3, 1986	An investigation of a chemical spill occurring on December 24, 1985, to determine if a removal would be warranted.
September 23, 1986	A site investigation asked for by the mayor of Fort Wayne, as a direct result of a chemical fire on September 9, 1986.

Attachment V
Summary of Materials

1) March 1985 findings of February 25, 1986, site assessment by TAT and OSC:

- Drums stored throughout Building A in rooms and hallways; several drums bulging due to freezing; seven drums totalling 105 gallons of toluene diisocyanate; semitrailer at loading dock contained unknown quantities and types of solidified wastes.

- 141 drums of waste solvents in Building B; HNU readings as follows:

background	0.2 - 0.4
interior	3 - 5
over opened drum of solids	30
over filter collection tank	100

15 Department of Defense lab packs, 20 5-gallon pails, and five 55-gallon drums unlabeled; floor drains cemented shut.

- 1,001 55-gallon drums in Building C; several drums bulging due to freezing; contents purported to be oil/water mixture; leakage noted on floor; floor drains cememted shut.

- Two semitrailers containing 153 55-gallon drums of solvents; one tanker containing 6,200 gallons of chlorinated solvents and water.

2) Findings of September 23, 1986, site inspection by TAT and OSC:

- 1,000 55-gallon drums in Building A; drums labelled to contain organic material, potassium permanganate, sodium hydroxide, sodium sulfide, sulfuric acid, nitric acid, and aluminum sulfate; numerous unlabelled drums marked as containing acid or base; 19 storage tanks ranging between 1,000 and 8,600 gallons reported to contain chromic acid, paint waste, and solvents, some with evidence of leakage; an additional 525 drums of organic material were found in the garage, some with leakage evident.

- 225 drums, three storage tanks of 10,000 gallons each, three storage tanks of 25,000 gallons each, and a 65,000 gallon clarifier in Building B; leakage was evident from some drums; storage tanks were nearly full of such materials as solvents and water, paint waste, and solvents.

- 1,000 drums in Building C; 10-15 of the drums were bulging with leakage evident.

- Six tankers reported to be half full of sludges; two 20-cubic yard rolloff boxes of contaminated soils and solidified material.

- Consultant to City performed limited random samoling of drums containing oily material, found the following concentrations of PCBs:

Arachlor 1,254, mg/kg	Frequency
< 50	7 samples
50 - 100	3 "
>100 (180, 230, 370)	3 "
	13 samples